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Susanne Guyer Director Federal Regulatory Matters DOCKET FILE COPY ORIGINAL

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NYNEX

June 24, 1993

EX PARTE

JUN 24 1993

Ms. Donna R. Searcy Secretary Federal Communications Commission Room 222 1919 M Street, N.W. Washington, D.C. 20554

Re: CC Docket No. 93-36

Dear Ms. Searcy:

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Today, Mr. J. Donovan, Mr. J. Bosley, Mr. A. Cort and I, representing the NYNEX Telephone Companies, met with Ms. D. Lampert, Mr. D. Gonzalez, and Mr. C. Libertelli of the Policy

TARIFF FILING REQUIREMENTS TO PROMOTE FAIR COMPETITION AMONG "DOMINANT" AND "NON-DOMINANT" CARRIERS

NYNEX JUNE 24,1993

Equality and Fairness have been debated between "Dominant" and "Non-Dominant" Carriers in the Policy Division's Forbearance Proceedings...

NYNEX Comments In CC 93-36

"Further Streamlining of tariff filing requirements for non-dominant carriers is not consistent with the Communications Act nor is it in the Public Interest."

One Day Notice Period

- Eliminates pre-effective tariff review
- Could result in non-compliance with the Commission's rules
- Is not in the Public Interest

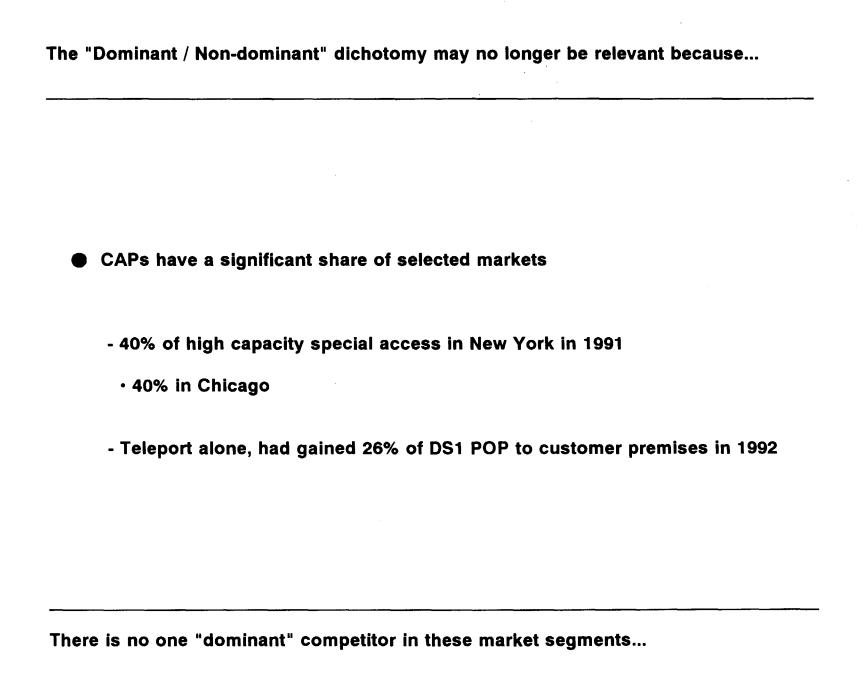
Equality and Fairness have been debated between "Dominant" and "Non-Dominant" Carriers in the Policy Division's Forbearance Proceedings...

Range of Rates and Maximum Rates

- Do not comply with the Communications Act
- Commission, customers and competitors denied meaningful information on CAP prices

The	"Dominant	Non-dominant"	dichotomy	may no lo	onger be	relevant l	oecause
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- MFS' total revenue growth: \$500k 1989; \$100m 1992
- MFS' network growth: 74% per year since 1988
- Teleport's network growth: 110% per year since 1988
- The significant financial resources they have
- Intense competition in NYNEX region, which has grown faster than in the rest of the nation



And, the Commission's pro-competitive public policy gives CAPs advantages which argue for equity in tariff requirements...

- Special and Switched Access Expanded Interconnection, Local Transport
- Intense competition is being promoted
- LECs prevented from reacting quickly to competition
- LECs "in the dark" on competitors prices

To promote equity and fair competition between "dominant" and "non-dominant" carriers NYNEX proposes the Commission consider...